

HEARING DATE: JUNE 18, 2024 @ 9 AM
OBJECTION DEADLINE: JUNE 11, 2024

Attorneys for Middle East Shipping Agencies Overseas Ltd.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

ELETSON HOLDINGS INC.,

Debtor.

Chapter 11

Case No. 23-10322 (JMP)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon this Notice of Motion and the accompanying Motion and Declaration of Rachel S. Blumenfeld, of the Law Office of Rachel S. Blumenfeld PLLC, will move this Court for an order withdrawing as attorneys of record for Middle East Shipping Agencies Overseas Ltd., and for such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that a hearing (the “Hearing”) on the Motion will be held on **June 18, 2024, at 9:00 a.m. (Eastern)**, or as soon thereafter as counsel can be heard, before The Honorable John P. Mastando III, United States Bankruptcy Judge, United States Bankruptcy Court – Southern District of New York, One Bowling Green, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that in accordance with General Order M-543 dated March 20, 2020, the Hearing will be conducted via video conference using Zoom for Government. Parties wishing to appear at the Hearing must make an electronic appearance through the “eCourtAppearances” tab on the Court’s website (<https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>) no later than 4:00 p.m. on the business day before the Hearing (the “Appearance Deadline”). Following the Appearance Deadline, the Court will circulate by email the Zoom link to the Hearing to those parties who have made an electronic appearance.

PLEASE TAKE FURTHER NOTICE that any responsive papers to the Motion must be filed with the Court and served on the Law Office of Rachel S. Blumenfeld PLLC with copies to the Chambers of The Honorable John P. Mastando III, United States Bankruptcy Judge, in accordance with applicable Chambers Rules, by no later than by 4:00 p.m. (Eastern) seven (7) days prior to the return date set forth above. Such papers shall conform to the Federal Rules of Civil Procedure and identify the party on whose behalf the papers are submitted, the nature of the response, and the basis for such response.

Dated: Brooklyn, New York
May 13, 2024

Respectfully submitted,
Law Office of Rachel S. Blumenfeld

By: /s/ Rachel S. Blumenfeld
Rachel S. Blumenfeld (RB-1458)
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Attorneys for Middle East Shipping Agencies Overseas Ltd.

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Case No. 23-10322 (JMP)

**MOTION & DECLARATIONS OF RACHEL S. BLUMENFELD, ESQ., IN SUPPORT OF
APPLICATIONS OF THE LAW OFFICE OF RACHEL S. BLUMENFELD PLLC
TO WITHDRAW AS ATTORNEYS OF RECORD FOR MIDDLE EAST SHIPPING
AGENCIES OVERSEAS LTD.**

Rachel S. Blumenfeld, of the firm The Law Office of Rachel S. Blumenfeld PLLC (the “Firms”), attorneys for the unsecured creditor Middle East Shipping Agencies Overseas Ltd. (hereinafter the “MESAO”), moves the Court for an Order permitting the Firms to withdraw as counsel for MESO in this case pursuant to 28 U.S.C. § 1746, and Local Bankruptcy Rule 2090-1(e); and declares under penalty of perjury as follows:

1. I am the attorney of record for MESAO (“MESAO” or the “Client”) and I am making this declaration in support of my Application to Withdraw as Attorney for MESAO. I have personal knowledge of the facts set forth herein, except to those facts that are stated upon information and belief, and as to those facts, I believe them to be true.

GENERAL BACKGROUND

2. On or about November 27, 2023 [ECF Docket No. 293], the Law Office of Rachel S. Blumenfeld PLLC filed Opposition to the Authority to Retain Dechert LLP as Counsel (the “Opposition”).

3. MESAO is now represented by The Law Office of Rachel S. Blumenfeld PLLC.

Facts in Support of Motion to Withdraw as Counsel

4. I do not have authority to take any further action on my client’s behalf in this matter; and in addition I no longer have a point of contact for the client at this time and therefore have no choice but to move to withdraw. It is my understanding there is no replacement counsel for MESAO.

RELIEF REQUESTED

6. The Firm is seeking an order pursuant to Rule 2090-1(e) (“Rule 2090-1(e)”) of the Local Bankruptcy Rules for the Southern District of New York.

7. The facts set forth above demonstrate cause for an order allowing the Firm to withdraw as attorneys for MESAO.

8. In the Sixth Circuit’s decision in Brandon v. Blech, 560 F.3d 536 (6th Cir. 2009), the Court noted, “while these rules stop short of guaranteeing a right to withdraw, they confirm that withdrawal is presumptively appropriate where the rule requirements are satisfied.” *Id.* at 538.

NO PRIOR REQUEST

9. No prior application has been made by me for the relief sought herein.

WHEREFORE, the Firm respectfully requests the entry of an Order granting the relief requested for which no previous request has been made, and that the Court grant such other and further relief it deems just and proper.

Dated: Brooklyn, New York
May 13, 2024

Respectfully submitted,
Law Office of Rachel S. Blumenfeld

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